

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

ARMIYA BANI LAGASAN,
Plaintiff,

v.

HADBAN AL-GHASEL

and

JIMLA AL-GHASEL also known as ZAMIA
MOHD also known as ZAMLA MOHD,
Defendants.

Civil Action No. 1:14-cv-01035-AJT-TCB

MOTION FOR DEFAULT JUDGMENT

Plaintiff Armiya Bani Lagasan (“Plaintiff”) hereby moves, pursuant to Rule 55(b) of the Federal Rules of Civil Procedure, for default judgment against Defendants Hadban Al-Ghasel and Jimla Al-Ghasel also known as Zamia Mohd also known as Zamla Mohd (collectively, “Defendants”). For the reasons set forth in the accompanying Memorandum, incorporated herein by reference, Plaintiff requests that the Court enter default judgment against Defendants on Counts I-VIII, and Count X of the First Amended Complaint, and award Plaintiff damages in the amount of \$749,351, plus reasonable attorneys’ fees.

In accordance with *Roseboro v. Garrison*, 528 F.2d 309 (4th Cir. 1975), Plaintiff hereby provides the following ***ROSEBORO V. GARRISON* WARNING** to Defendants:

1. You are entitled to file a response to Plaintiff’s Motion for Default Judgment (“Plaintiff’s Motion”). Any such response must be filed within eleven (11) days of the date on which you are served. *See* E.D. Va. Local Rule 7(F)(1).
2. If you do not file a response, the Court could enter a judgment against you on the

basis of Plaintiff's Motion.

3. In your response, you must identify all facts stated by Plaintiff with which you disagree and you must set forth your version of the facts by offering affidavits (written statements signed before a notary public and under oath) or by filing sworn statements (bearing a certificate that it is signed under penalty of perjury); and

4. You are also entitled to file a legal brief in opposition to the one filed by Plaintiff.

Dated: December 17, 2014

Respectfully submitted,

/s/ Jason C. Schwartz

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Attorneys for Plaintiff Armiya Bani Lagasan

CERTIFICATE OF SERVICE

I hereby certify that on the 17th day of December, 2014, I deposited in the United States mail a true and correct copy of the above in a sealed envelope, with first class postage prepaid, to the addressees shown below:

Hadban and Jimla Al-Ghasel
100 South Reynolds Street, Unit # 603
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/s/ Jason C. Schwartz
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